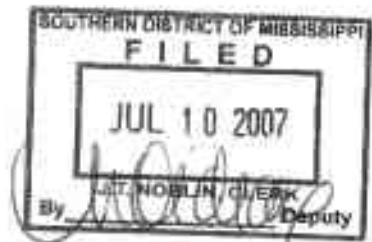


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



JOHNNY O'BRYANT, #289746

PLAINTIFF

VERSUS

CASE NO. 1:07cv477-LG-RHW

HARRISON COUNTY ADULT DETENTION CENTER,  
GEORGE H. PAYNE, JR., DONALD A. CABANA,  
KARL STOLZE, RICK GASTON, RHONDOLYN ROGERS,  
JOE COLLINS and HARRISON COUNTY, MISSISSIPPI

DEFENDANTS

**DEFENDANT KARL STOLZE'S ANSWER TO AMENDED COMPLAINT**

COMES NOW, the Defendant, KARL STOLZE, and files this his Answer to Amended Complaint and in support thereof would show unto the Court the following, to-wit:

1. The Defendant, KARL STOLZE, admits allegations in Paragraph 1 of the Amended Complaint.
2. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 2 of Amended Complaint and therefore denies said allegations.
3. The Defendant, KARL STOLZE, admits allegations in Paragraph 3 of the Amended Complaint.
4. The Defendant, KARL STOLZE, admits allegations in Paragraph 4 of the Amended Complaint.
5. The Defendant, KARL STOLZE, admits allegations in Paragraph 5 of the Amended Complaint.
6. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 6 of Amended Complaint and therefore denies said allegations.
7. The Defendant, KARL STOLZE, admits allegations in Paragraph 7 of the Amended Complaint.

8. The Defendant, KARL STOLZE, admits allegations in Paragraph 8 of the Amended Complaint.

9. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 9 of Amended Complaint and therefore denies said allegations.

10. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 10 of Amended Complaint and therefore denies said allegations.

11. The Defendant, KARL STOLZE, admits allegations in Paragraph 11 of the Amended Complaint.

12. The Defendant, KARL STOLZE, admits allegations in Paragraph 12 of the Amended Complaint.

13. The Defendant, KARL STOLZE, denies allegations in Paragraph 13 of the Amended Complaint.

14. The Defendant, KARL STOLZE, denies allegations in Paragraph 14 of the Amended Complaint.

15. The Defendant, KARL STOLZE, denies allegations in Paragraph 15 of the Amended Complaint.

16. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 16 of Amended Complaint and therefore denies said allegations.

17. The Defendant, KARL STOLZE, denies allegations in Paragraph 17 of the Amended Complaint.

18. The Defendant, KARL STOLZE, denies allegations in Paragraph 18 of the Amended Complaint.
19. The Defendant, KARL STOLZE, denies allegations in Paragraph 19 of the Amended Complaint.
20. The Defendant, KARL STOLZE, denies allegations in Paragraph 20 of the Amended Complaint.
21. The Defendant, KARL STOLZE, admits allegations in Paragraph 21 of the Amended Complaint.
22. The Defendant, KARL STOLZE, denies allegations in Paragraph 22 of the Amended Complaint.
23. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 23 of Amended Complaint and therefore denies said allegations.
24. The Defendant, KARL STOLZE, denies allegations in Paragraph 24 of the Amended Complaint.
25. The Defendant, KARL STOLZE, denies allegations in Paragraph 25 of the Amended Complaint.
26. The Defendant, KARL STOLZE, denies allegations in Paragraph 26 of the Amended Complaint.
27. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 27 of Amended Complaint and therefore denies said allegations.

28. The Defendant, KARL STOLZE, denies allegations in Paragraph 28 of the Amended Complaint.

29. The Defendant, KARL STOLZE, denies allegations in Paragraph 29 of the Amended Complaint.

30. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 30 of Amended Complaint and therefore denies said allegations.

31. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 31 of Amended Complaint and therefore denies said allegations.

31. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 31 of Amended Complaint and therefore denies said allegations.

32. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 32 of Amended Complaint and therefore denies said allegations.

33. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 33 of Amended Complaint and therefore denies said allegations.

34. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 34 of Amended Complaint and therefore denies said allegations.

35. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 35 of Amended Complaint and therefore denies said allegations.

36. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 36 of Amended Complaint and therefore denies said allegations.

37. The Defendant, KARL STOLZE, denies allegations in Paragraph 37 of the Amended Complaint.

38. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 38 of Amended Complaint and therefore denies said allegations.

39. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 39 of Amended Complaint and therefore denies said allegations.

40. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 40 of Amended Complaint and therefore denies said allegations.

41. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 41 of Amended Complaint and therefore denies said allegations.

42. The Defendant, KARL STOLZE, denies allegations in Paragraph 42 of the Amended Complaint.

43. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 43 of Amended Complaint and therefore denies said allegations.

44. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 44 of Amended Complaint and therefore denies said allegations.

45. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 45 of Amended Complaint and therefore denies said allegations.

46. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 46 of Amended Complaint and therefore denies said allegations.

47. The Defendant, KARL STOLZE, denies allegations in Paragraph 47 of the Amended Complaint.

48. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 48 of Amended Complaint and therefore denies said allegations.

49. The Defendant, KARL STOLZE, denies allegations in Paragraph 49 of the Amended Complaint.

50. The Defendant, KARL STOLZE, denies allegations in Paragraph 50 of the Amended Complaint.

50. The Defendant, KARL STOLZE, denies allegations in Paragraph 50 of the Amended Complaint.

51. The Defendant, KARL STOLZE, denies allegations in Paragraph 51 of the Amended Complaint.
52. The Defendant, KARL STOLZE, denies allegations in Paragraph 52 of the Amended Complaint.
53. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 53 of Amended Complaint and therefore denies said allegations.
54. The Defendant, KARL STOLZE, denies allegations in Paragraph 54 of the Amended Complaint.
55. The Defendant, KARL STOLZE, denies allegations in Paragraph 55 of the Amended Complaint.
56. The Defendant, KARL STOLZE, denies allegations in Paragraph 56 of the Amended Complaint.
57. The Defendant, KARL STOLZE, denies allegations in Paragraph 57 of the Amended Complaint.
58. The Defendant, KARL STOLZE, denies allegations in Paragraph 58 of the Amended Complaint.
59. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 59 of Amended Complaint and therefore denies said allegations.
60. The Defendant, KARL STOLZE, denies allegations in Paragraph 60 of the Amended Complaint.

61. The Defendant, KARL STOLZE, denies allegations in Paragraph 61 of the Amended Complaint.
62. The Defendant, KARL STOLZE, denies allegations in Paragraph 62 of the Amended Complaint.
63. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 63 of Amended Complaint and therefore denies said allegations.
64. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 64 of Amended Complaint and therefore denies said allegations.
65. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 65 of Amended Complaint and therefore denies said allegations.
66. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 66 of Amended Complaint and therefore denies said allegations.
67. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 67 of Amended Complaint and therefore denies said allegations.
68. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 68 of Amended Complaint and therefore denies said allegations.

69. The Defendant, KARL STOLZE, denies allegations in Paragraph 69 of the Amended Complaint.

70. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 70 of Amended Complaint and therefore denies said allegations.

71. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 71 of Amended Complaint and therefore denies said allegations.

72. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 72 of Amended Complaint and therefore denies said allegations.

73. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 73 of Amended Complaint and therefore denies said allegations.

74. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 74 of Amended Complaint and therefore denies said allegations.

75. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 75 of Amended Complaint and therefore denies said allegations.

76. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 76 of Amended Complaint and therefore denies said allegations.

77. The Defendant, KARL STOLZE, is without sufficient information in which to admit or deny the allegations in Paragraph 77 of Amended Complaint and therefore denies said allegations.

78. The Defendant, KARL STOLZE, denies allegations in Paragraph 78 of the Amended Complaint.

79. The Defendant, KARL STOLZE, denies allegations in Paragraph 79 of the Amended Complaint.

80. The Defendant, KARL STOLZE, denies allegations in Paragraph 80 of the Amended Complaint.

81. The Defendant, KARL STOLZE, denies allegations in Paragraph 81 of the Amended Complaint.

82. The Defendant, KARL STOLZE, denies allegations in Paragraph 82 of the Amended Complaint.

Respectfully submitted, this the 6<sup>th</sup> day of July, 2007.

  
KARL STOLZE  
Defendant

**CERTIFICATE OF SERVICE**

I, Karl Stolze, do certify that I have this day mailed via U. S. Mail, postage prepaid, a true and correct copy of the above document to the following:

Johnny O'Bryant, B-B  
Harrison County Adult Detention Center  
10451 Larkin Smith Drive  
Gulfport, MS 39503

Harrison County  
1620 23<sup>rd</sup> Avenue  
Gulfport, MS 39501

Sheriff of Harrison County  
George H. Payne, Jr.  
1620 23<sup>rd</sup> Avenue  
Gulfport, MS 39501

Office of the Warden  
c/o Donald A. Cabana  
10451 Larkin Smith Drive  
Gulfport, MS 39503

Clerk's Office Southern Division  
Dan M. Russell, Jr., U.S. Courthouse  
2012 15<sup>th</sup> Street, Suite 403  
Gulfport, MS 39501

SO CERTIFIED, this the 6<sup>th</sup> day of July, 2007.

  
KARL STOLZE